



# **ABS Consulting**

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***“Supply Chain Harmony – Logistics and Trade  
Compliance Synchronized for Optimal Performance”***

May 22, 2015

**FEDERAL MARITIME COMMISSION**

Attn.: Secretary  
800 North Capitol Street, NW  
Washington, DC 20573-0001

Copy:

**GKG Law, P.C.**

Attn.: Edward D. Greenberg  
1055 Thomas Jefferson Street, NW, Suite 500  
Washington, DC 20007

Re: Petition P2-15

Ladies & Gentlemen:

I am in full support of the petition filed by the NCBFAA to initiate a rulemaking to revise the Commission's regulations in 46 CFR Part 532, NVOCC Negotiated Rate Arrangements (NRAs) to allow the inclusion of economic terms beyond rates in NRAs, and to permit NRAs to be modified at any time upon mutual agreement between a NVOCC and shipper. I also agree that eliminating 46 CFR Part 531 in its entirety addressing NSA's would be appropriate.

I thus recommend that the Commission proceed with the corresponding rulemaking process as this clearly reflects how shippers negotiate and contract with NVOCC's today and it will greatly simplify the process and make it easier for NVOCC's and shippers to cooperate and eliminate burdensome and not needed requirements and associated costs.

If you have any questions, please do not hesitate to contact me at any time.

Sincerely,

Albert W. Saphir  
Principal

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